

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII DEPARTMENT
OF EDUCATION; PATRICIA
HAMAMOTO, Superintendent of
Hawai'i Schools, MEREDETH
MAEDA, Principal, Castle High
School; SARA GRONNER OR
GRONNA, Vice Principal of Castle
High School,

Defendants.

CIVIL NO. 04-00390 JMS-KSC

DECLARATION OF
MEREDITH MAEDA

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I, MEREDITH MAEDA, declare as follows:

1. I am employed by the Department of Education as the principal of Castle High School. I have served as the principal for this school since 1999.
2. As the Principal, I am responsible for the overall administrative oversight of the entire school, including the supervision of the school's students, teachers and programs. I am assisted in this regard by three vice principals, each of whom are assigned various supervisory duties.
3. As the principal, I am familiar with programs that provide instruction for students who were not able to attend school. One of the tutoring programs of

the Department Education that provides for instruction off the school's campus is known as the Home-Hospital Instruction Services program. This program offers tutoring services to students who are not able to attend school for medical reasons. As far as I know, this program never had a policy that prohibited the assignment of a male teacher as a tutor for a female student. Moreover, I was never authorized to establish a policy under any tutoring program to prohibit male teachers from tutoring female students in need of instruction outside of our campus. Therefore, I never established such a policy.

4. During the timeframe of 2003-2005, a vice principal would be assigned to oversee the implementation of this program on behalf of students of this school. The assigned vice principal would coordinate the school's efforts to obtain tutorial services for a Castle High School student through the Windward District Office that administered the program. During this period of time, I did not select or assign or hire any tutors on behalf of any students of Castle High School with regards to the Home-Hospital Instruction Services program.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, December 14, 2006.



MEREDITH MAEDA